

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
Defendant.)	

**IBM’S MOTION FOR SUMMARY JUDGMENT OF NO INVALIDITY OF THE
ASSERTED CLAIMS OF U.S. PATENT NO. 5,961,601 IN VIEW OF AMAZON AND
NO INVALIDITY OF CLAIMS 9, 10, 58, AND 59 OF U.S. PATENT NO. 5,961,601**

Plaintiff International Business Machines Corporation (“IBM”) hereby moves for summary judgment of no invalidity of the asserted claims of U.S. Patent No. 5,961,601 in view of Amazon and no invalidity of claims 9, 10, 58, and 59 of U.S. Patent No. 5,961,601. Attached hereto is a proposed order granting summary judgment of no invalidity of the asserted claims of U.S. Patent No. 5,961,601 in view of Amazon and no invalidity of claims 9, 10, 58, and 59 of U.S. Patent No. 5,961,601. The grounds for IBM’s motion are set forth in its brief in support filed concurrently herewith.

Respectfully submitted,

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